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July 30, 2015

VIA ECF and FAX ((212) 805-6724)

Honorable Frank Maas, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 20A
New York, NY 10007

Re: Jordan Warman, et al. v. American National Standards Institute
Docket No: 1:15-CV-5486(RA)(FM)

Dear Judge Maas:

We represent defendant American National Standards Institute (“ANSI”) in this matter. We write to respectfully request an extension of time by which to answer, move, or otherwise respond to Plaintiff Jordan Warman’s Complaint. Defendant’s counsel were recently retained, are in the process of investigating Plaintiff’s claims, and would benefit from a brief additional period by which to respond. Defendant’s response is currently due on August 10, 2015. Defendants request a twenty-one day extension, until August 31, 2015, to answer, move, or otherwise respond to the Complaint. This is Defendant’s first request for an extension of time to respond to the Complaint and Plaintiff’s counsel consents to this request. This extension will not affect any other previously scheduled deadlines.

The parties also request an adjournment of the September 25, 2015 Initial Case Management Conference, as Plaintiff’s counsel is unavailable on this date. The parties are available on October 26, 2015, and understand from your law clerk, Mr. Slavinskiy, that Your Honor is available on that date as well.

Respectfully submitted,

/s/ Michael J. Puma
Michael J. Puma

cc: Alisa Ann Martin, Esq. and Todd Seth Garber, Esq. (counsel for Plaintiff, via ECF)